



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CARIBBEAN ENVIRONMENTAL PROTECTION DIVISION
CITY VIEW PLAZA, SUITE 7000
#48 165 RD. KM 1.2
GUAYNABO, PR 00968-8069

AUG 04 2014

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Article Number: 7011 0470 0000 5040 3592

Honorable Carmen Yulín Cruz Soto
Mayor
Municipality of San Juan
P.O. Box 9024100
San Juan, Puerto Rico 00902-4100

Alberto M. Lázaro Castro, P.E.
Executive President
Puerto Rico Aqueduct and Sewer Authority
P.O. Box 7066
San Juan PR 00916-9990

Re: Villa Kennedy Housing Complex Reconnaissance Inspection
Municipality of San Juan (MSJ) Municipal Separate Storm Sewer System (MS4) Permit
(PRR040036)
Puerto Rico Aqueduct and Sewer Authority (PRASA) Puerto Nuevo Wastewater Treatment
Plant Collection System (PR0021555)

Dear Mrs. Cruz and Eng. Lázaro:

This letter is in reference to the National Pollutant Discharge Elimination System (NPDES) Reconnaissance Inspection (RI) conducted by the United States Environmental Protection Agency's (EPA) Region 2, Caribbean Environmental Protection Division on July 16, 2014 on Villa Kennedy Housing Complex in San Juan, Puerto Rico. The findings of the inspection report were informed to MSJ and PRASA representatives via email on July 16, 2014. This report serves as the formal documentation of the inspection findings.

Within forty five (45) days of receipt of this letter, respond to EPA-CEPD in writing with the actions that MSJ and PRASA has taken or will take to address the non-compliance items and areas of concern identified in the report. MSJ and PRASA must add these items to its Action Registry, and work to correct these items in an expeditious manner. If any items requires extensive repairs and/or capital investments, PRASA must ensure they are added to the Action Registry according to the established priorities.

Also send a copy of your response to Wanda E. García Hernández, Director, Water Quality Area, EQB, Puerto Rico Environmental Quality Board, P.O. Box 11488, Santurce, Puerto Rico 00910



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CARIBBEAN ENVIRONMENTAL PROTECTION DIVISION
CITY VIEW PLAZA, SUITE 7000
#48 165 RO. KM 1.2
GUAYNABO, PR 00968-8069

AUG 04 2014

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Article Number: 7011 0470 0000 5040 3318

Honorable Carmen Yulín Cruz Soto
Mayor
Municipality of San Juan
P.O. Box 9024100
San Juan, Puerto Rico 00902-4100

Alberto M. Lázaro Castro, P.E.
Executive President
Puerto Rico Aqueduct and Sewer Authority
P.O. Box 7066
San Juan PR 00916-9990

Re: Villa Kennedy Housing Complex Reconnaissance Inspection
Municipality of San Juan (MSJ) Municipal Separate Storm Sewer System (MS4) Permit
(PRR040036)
Puerto Rico Aqueduct and Sewer Authority (PRASA) Puerto Nuevo Wastewater Treatment
Plant Collection System (PR0021555)

Dear Mrs. Cruz and Eng. Lázaro:

This letter is in reference to the National Pollutant Discharge Elimination System (NPDES) Reconnaissance Inspection (RI) conducted by the United States Environmental Protection Agency's (EPA) Region 2, Caribbean Environmental Protection Division on July 16, 2014 on Villa Kennedy Housing Complex in San Juan, Puerto Rico. The findings of the inspection report were informed to MSJ and PRASA representatives via email on July 16, 2014. This report serves as the formal documentation of the inspection findings.

Within forty five (45) days of receipt of this letter, respond to EPA-CEPD in writing with the actions that MSJ and PRASA has taken or will take to address the non-compliance items and areas of concern identified in the report. MSJ and PRASA must add these items to its Action Registry, and work to correct these items in an expeditious manner. If any items requires extensive repairs and/or capital investments, PRASA must ensure they are added to the Action Registry according to the established priorities.

Also send a copy of your response to Wanda E. García Hernández, Director, Water Quality Area, EQB, Puerto Rico Environmental Quality Board, P.O. Box 11488, Santurce, Puerto Rico 00910

If you have any questions please feel free to contact me at 787-977-5840.

Sincerely,



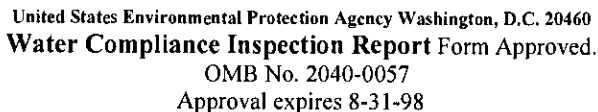
Chief

Municipal Water Program Branch

Caribbean Environmental Protection Division

Enclosure

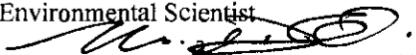
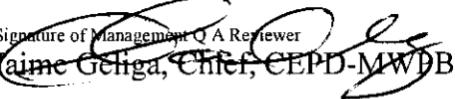
cc: Wanda E. García Hernández, Director, Water Quality Area, PREQB
Noelia Rosa, Municipality of San Juan, Director Environmental Affairs Office
María Matos, Municipality of San Juan, Environmental Affairs Program (via email)
Maylene Pérez, Municipality of San Juan, Environmental Affairs Program (via email)
Emma Blanco, PRASA Metro Region Compliance (via email)
William Díaz, PRASA Metro Region Compliance (via email)
Héctor Cepeda, PRASA Metro Region Compliance (via email)
Yanira Cosme, PRASA Metro Region Compliance (via email)
Christie Mota, PRASA Metro Region Compliance (via email)
Juan Pérez, PRASA (electronically via email)
Javier Laureano, San Juan Bay Estuary Program, Director (via email)
Luis Cintrón, Company for the Development of Cantera Peninsula, Director (via email)



| | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|----------------------|---|-------|--|--|----|---|---|---|---|---|---|-----------|---|----|----|-----------------|---|--------------------|---|----------|---|----|--|--|-------|--|------|
| Transaction Code | | NPDES | | | | | | | | | | yr/mo/day | | | | Inspection Type | | Inspector | | Fac Type | | | | | | | |
| 1 | N | 2 | | 3 | P | R | R | 0 | 4 | 0 | 0 | 3 | 6 | 11 | 12 | 1 | 4 | 0 | 7 | 1 | 6 | 17 | | | 18-19 | | R201 |
| Remarks | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 21 | | | | | | | | | | | | | | | | | | | | | | | | | | | 66 |
| Inspection Work Days | | | | Facility Self-Monitoring Evaluation Rating | | | | | | | | | | B1 | | QA | | -----Reserved----- | | | | | | | | | |
| 67 | | 3 | | 69 | 70 | | | | | | | | | | U | 71 | | 72 | | 73747580 | | | | | | | |

| | | | |
|---|--|---|--|
| Name and Location of Facility Inspected (for industrial users discharging to POTW, also include POTW name and NPDES permit number) | | Entry Time/Date Permit Effective Date <div style="border: 1px solid black; padding: 5px; text-align: center;"> 9:00 PM July 16, 2014 </div> | |
| Villa Kennedy Housing Complex - Municipality of San Juan MS4 P.O. Box 9024100, San Juan, Puerto Rico 00902-4100 Puerto Rico Aqueduct and Sewer Authority (PRASA) Puerto Nuevo Regional WWTP NPDES Permit No. PR0021555 | | Exit Time/Date Permit Expiration Date <div style="border: 1px solid black; padding: 5px; text-align: center;"> 1:30 PM July 16, 2014 </div> | |
| Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) San Juan MS4 Ms. Noelia Rosa: Executive Director Urbanism, Permits and Environmental Affairs Office Tel. No. (787) 480-3135 See Enclosed report for additional information of representatives | | Other Facility Data – Other Responsible Officials Alberto M. Lázaro Castro, P.E. Executive President, Puerto Rico Aqueduct and Sewer Authority P.O. Box 7066, Barrio Obrero Station, Santurce, Puerto Rico 00916 | |
| Name, Address of Responsible Official/Title/Phone and Fax Number(s) Honorable Carmen Yulín Cruz Soto, Mayor Autonomous Municipality of San Juan P.O. Box 9024100 San Juan, Puerto Rico 00902-4100 | | <div style="text-align: right;">Contacted</div> <div style="border: 1px solid black; padding: 2px; display: flex; justify-content: space-around;"> Yes <input checked="" type="checkbox"/> No </div> | |

| | | | | | |
|---|--------------------------|--|-------------------------|---|---|
| | Permit | | Flow Measurement | X | Operations & Maintenance CSO/SSO (Sewer Overflow) |
| | Records/Reports | | Self-Monitoring Program | | Sludge Handling/Disposal Pollution Prevention |
| X | Facility Site Review | | Compliance Schedules | | Pretreatment Multimedia |
| X | Effluent/Receiving Water | | Laboratory | X | Storm Water |

| | |
|---|--|
| See Enclosed Report | |
| Name(s) and Signature(s) of Inspector(s) Alex O. Rivera, Environmental Engineer  | Agency/Office/Phone and Fax Numbers Date U.S. EPA Region 2-CEPD - 787-977-5845 7/31/14 |
| Miguel Diaz, Environmental Scientist  | U.S. EPA Region 2-CEPD - 787-977-5877 31/07/2014 |
| Signature of Management Q A Reviewer Jaime Geliga, Chief, CEPD-MWPB  | Agency/Office/Phone and Fax Numbers Date U.S. EPA Region 2, CEPD MWPB 787-977-5840 7/31/14 |

**SUPPLEMENT TO WATER COMPLIANCE INSPECTION REPORT FORM
(EPA FORM 3560-3 (REV 9-94))**

**VILLA KENNEDY HOUSING COMPLEX STORMWATER AND
WASTEWATER COLLECTION SYSTEMS**

Reconnaissance Inspection: Municipality of San Juan Municipal Separate Storm
Sewer System (MS4) Permit PRR040036

Puerto Rico Aqueduct and Sewer Authority Puerto
Nuevo Regional Wastewater Treatment Plant
National Pollutant Discharge Elimination System
(NPDES) Permit PR0021555

Inspection Date: July 16, 2014

Inspectors: Alex O. Rivera, Environmental Engineer,
USEPA Region 2, CEPD-MWPB,
(787) 977-5845

Miguel Diaz, Environmental Scientist
USEPA Region 2, CEPD-MWPB
(787) 977-5877

I. Background:

On July 16, 2014, Alex O. Rivera and Miguel Díaz of EPA Region 2 conducted a reconnaissance inspection of the storm water and wastewater sewer collection system at the Villa Kennedy Housing Complex in San Juan, Puerto Rico. The inspection was conducted in response to a citizen complaint presented by representatives of the Villa Kennedy Housing Complex, adjacent communities and members of the Company for the Integral Development of the Cantera Peninsula.

The inspection was coordinated with the San Juan Bay Estuary Program (SJBEP) and was represented by Ernesto Olivares, Roberto Morales, Ruben Hernández and Jorge Bauzá. The Puerto Rico Aqueduct and Sewer Authority (PRASA) and the Municipality of San Juan (MSJ) were also present and represented by Javier Robles and Alexander Avila respectively. The community was represented by María Barrios, Wilfredo Rivera, Norka Rivera, and Fredy Ruiz.

II. Inspection Purpose:

On July 9, 2014 EPA and the SJBEP participated in a meeting held in the Villa Kennedy Housing Complex to discuss the issues related to the stormwater and wastewater collection systems affecting the community. During the meeting we agreed on conducting a series of reconnaissance inspection on the communities bordering Los

Corozos Lagoon to assess and identify the issues affecting those communities. The Villa Kennedy Housing Complex community was chosen to be the first impacted by such inspections.

III. Inspection Findings and Observations:

The findings and observations of the RI are included below *(Please refer to Attachment I for locations and Attachment II for the photos showing more details about the findings):*

1. Wastewater manhole at the sidewalk of Blanca Rexach Street, near to residence #353, the manhole was found covered by a metal panel. The manhole does not have the covering structure and was found with significant amount of flow toward the Eduardo Conde Avenue and Blanca Rexach Street intersection. We need PRASA to define the source of what appears to be a force line. Also PRASA shall provide an appropriate covering structure to the above mentioned manhole.
2. The wastewater service connection serving Building #20 was observed overflowing. The connection is located in the back of the building. This situation was also documented occurring on July 24, 2014. A citizen complaint #48009169 was generated on July 24, 2014 at PRASA complaint system related to the wastewater overflows occurring in the complex.
3. A drinking water leakage was observed between Buildings #20 and #21. Based on the residents it has been occurring for a long period of time.
4. Several wastewater manholes were observed with high levels wastewater and solids accumulation at buildings #22, #23 and #24. PRASA informed us that they are in the process of coordinating a project to repair a segment of their collection system that will solve the issues at the area. We need PRASA to inform us about the details of that project and the schedule of it.
5. An additional wastewater service connection was observed overflowing in the back of Building #23 (corner adjacent to Building #24).
6. A wastewater overflow was also observed occurring in the back of Building #24.
7. Wastewater was observed flowing into the stormwater collection system on the back of Building #30. Based on PRASA's Javier Robles, the issue is related to the sewer pipe that needs to be replaced between Buildings #20 to #24.
8. A storm water manhole located in the back of building #30 was observed with significant flow sewage and foam related to greywaters.
9. A wastewater service connection was observed overflowing and located in the back of Building #5 (near baseball park). This situation was observed and documented occurring on July 24, 2014.
10. Wastewater manhole adjacent to the baseball park and back corner of Building #5. The manhole was found full of solids (mostly sand). On July 24, 2014 the manhole was observed with less amounts of solids, however the bottom of it was still covered by solids.

11. The wastewater manhole between Buildings #5 and #30 was found with solids accumulated and clogging its half-pipe and in need of cleaning.
12. A storm water manhole adjacent to the basketball court was found with significant amount of flow with wastewater characteristics. The flow is discharge to an open channel and subsequently into the Los Corozos Lagoon.
13. Sewage was observed flowing from a pipe located in front of Building #4 and apartment #55 into the stormwater collection system.
14. A wastewater manhole located in the sidewalk and corner of Building #15 was observed with high levels of sewage. The manhole was found with high levels of wastewater and with green markings that allegedly were made by PRASA to identify an issue with the wastewater collection system between Building #15 and #19. The residents claimed that the area has been subject to wastewater overflows during the past years.
15. Aside of the wastewater flows related to PRASA's system reaching the stormwater collection system the most critical condition found was the fact that the majority of the buildings were documented with pipes conveying greywaters into the stormwater collection system.
16. The community is very concern about the lack of signs to warn the residents of the communities bordering Los Corozos Lagoon about the water quality at the waterbody and those outfalls with presence of contaminated waters.
17. The wastewater collection open channels that convey stormwater into the Los Corozos Lagoon were found clogged by vegetation, trash and other materials.
18. Several stormwater catch basins were observed full of solids. Others like the ones located to the west of Building #37 were found broken and posing a safety issue to the residents of the complex.
19. During the inspection we found the estuarine wetland area of the Los Corozos Lagoon located to the northwest part of the Villa Kennedy Housing Complex being filled by construction and demolition debris and other rubbish. The estuarine wetland vegetation was also impacted and removed in some areas. The Los Corozos Lagoon was also found with significant amounts of trash and other solids accumulated on its shore.

IV. Conclusion

Wastewater is a pollutant as defined by Section 502(6) of the Clean Water Act (Act), 33 U.S.C. § 1362. The Los Corozos Lagoon, its estuarine wetlands and the Atlantic Ocean are Waters of the United States as defined by the Act. Los Corozos Lagoon is part of the San Juan Bay Estuary. The Villa Kennedy Housing Complex Wastewater Collection System and the San Juan Municipality MS4 are point sources as define by the Act. The Villa Kennedy Housing Complex Wastewater Collection System is an appurtenance of the Puerto Rico Aqueduct and Sewer Authority (PRASA) and is a point source as define by the Act. The MS4 is an appurtenance of the Municipality of San Juan and is a point

source as define by the Act. The Villa Kennedy Housing Complex Wastewater Collection System and the Municipality of San Juan MS4 discharge by gravity, stormwater and wastewater (e.g., illicit discharges) into the Los Corozos Lagoon. PRASA and MSJ unlawfully discharges pollutants (e.g., wastewater) into the Los Corozos Lagoon by the use of the MS4. PRASA and MSJ does not have an NPDES permit to discharge the pollutants (e.g. sewage, wastewater solids) that were observed being discharge into the Los Corozos Lagoon through the San Juan Municipality MS4.

PRASA and MSJ shall include as part of their response to this inspection report the actions taken to comply with their respective NPDES permits. MSJ and PRASA must add these non-compliance items to its Action Registry, and work to correct them in an expeditious manner. If any items requires extensive repairs and/or capital investments, PRASA and MSJ must ensure they are added to the Action Registry according to the established priorities. MSJ shall identify and eliminate the illicit discharges (e.g. sewage, greywaters) into their stormwater collection system. MSJ and PRASA shall work together with the community on establishing an education campaign to ensure the correct use of the sewer systems in the area and to expedite the response to citizen complaints.

Under Section 404 of the Act (33 CFR Part 323) the U.S. Corps of Engineers (USCOE) define the following activities as permit requiring discharges: the placement of fill necessary for the construction of any structure or infrastructure in a water of the United States; building of any structure, infrastructure, or impoundment in waters of the United States requiring rock, sand, dirt, or other material for its construction; site-development fills in waters of the United States for recreational, industrial, commercial, residential, or other uses; causeways or road fills, dams and dikes, artificial islands, bean nourishment, levees, and artificial reefs; property protection and/or reclamation devices such as rip rap, groins, seawalls, breakwaters, and revetments; and fill for structures such as sewage treatment facilities. Thus, MSJ shall alert and make the necessary arrangements with the USCOE to investigate the situation of the illegal filling and removal of vegetation on the estuarine wetland located to the northwest of the Villa Kennedy Housing Complex since the activities being taken appear to be unpermitted.

Report prepared by:

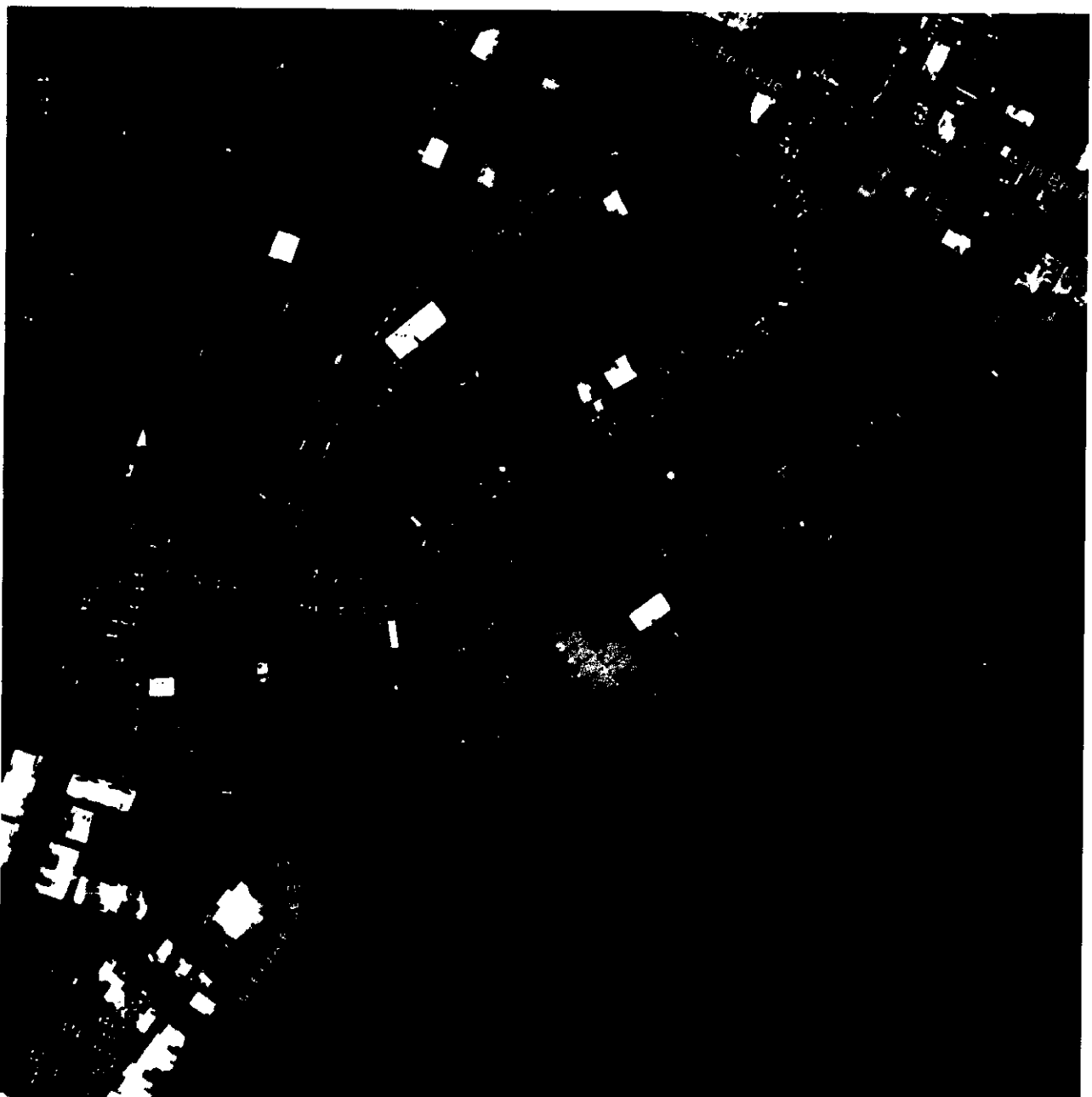

Eng. Alex O. Rivera
Environmental Engineer

Dated: July 28, 2014


Attachment I – Location Maps
Attachment II – Photo Log

ATTACHMENT I

Location Maps

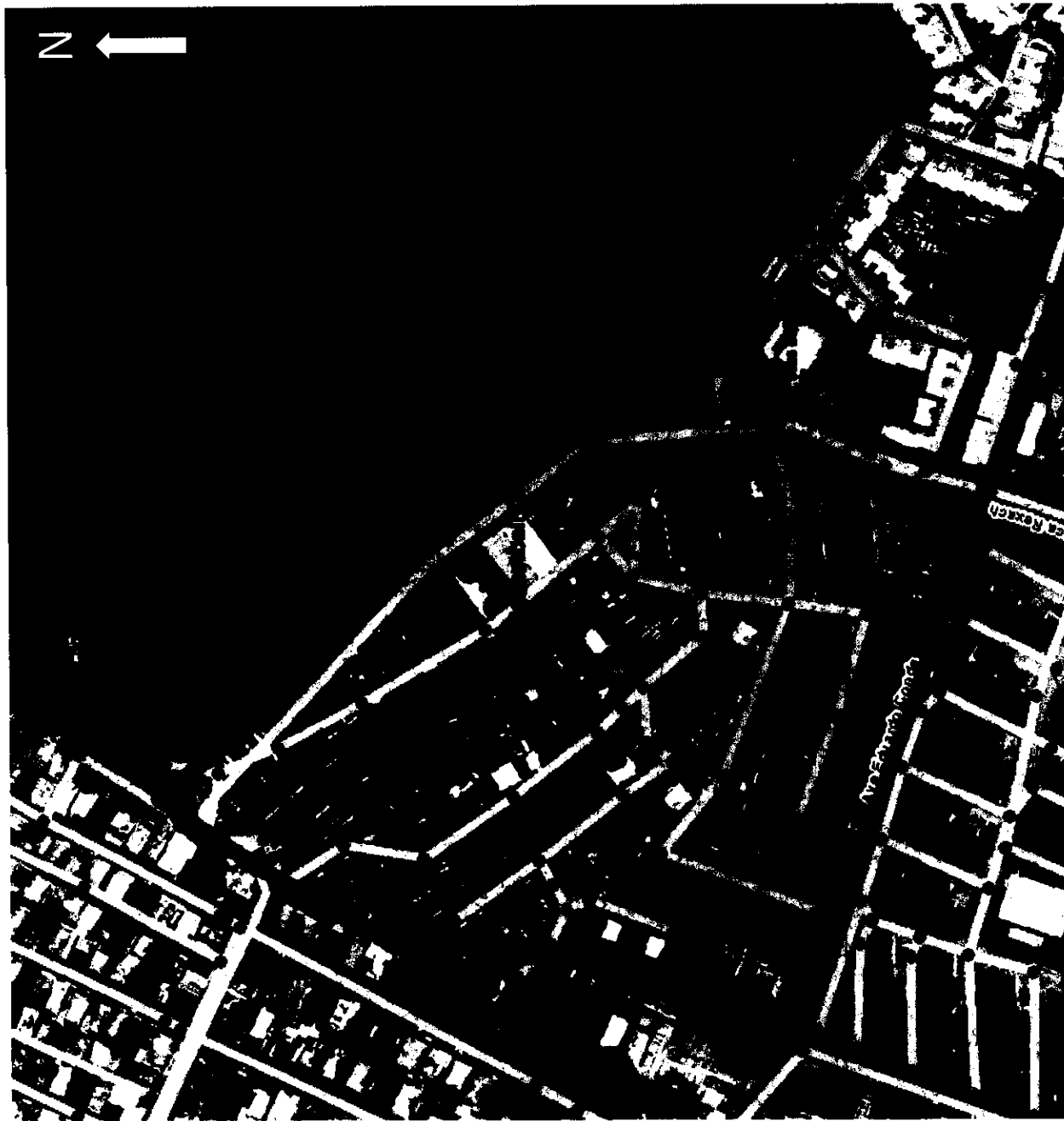


Legend*:

Villa Kennedy Housing Complex 

*Photo from Google Earth©

Figure 1: Villa Kennedy Housing Complex Boundaries Layout



Legend*:

- Villa Kennedy Building Complex
- Stormwater collection system Outfall and open channel Discharge into Los Corozos Lagoon
- PRASA Manholes
- PRASA Wastewater Line
- Buildings #'s
- Wetland Area

*Photo from PRASA Sanitary Sewer Infrastructure GIS Database

Figure 2: Villa Kennedy Housing Complex Findings Layout

ATTACHMENT II

Photo Log



Photo #1 Wastewater manhole #1, located at the sidewalk of Blanca Rexach Street, near to residence #353, the manhole was found covered by a metal panel.



Photo #2 and #3 - Wastewater manhole #1, it does not have the proper covering structure and was found in very poor condition.

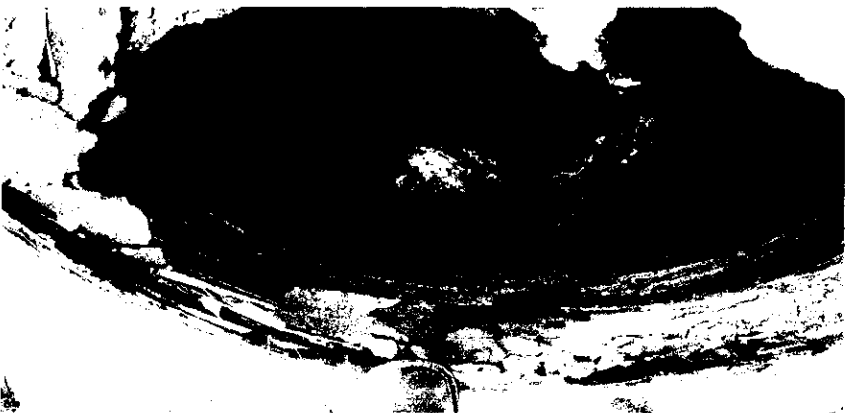




Photo #4, #5 and #6 – Building #20 wastewater service connection was found overflowing. The connection is located in the back of Building #20. This situation was also documented on July 24, 2014.



Photo #7, #8 and #9 - Several wastewater manholes with high levels of wastewater and solids accumulation at the back of buildings #22, #23 and #24. Signs of recent overflows were also observed.





Photo #10 - Wastewater service connection overflowing in the back of Building #23 (corner adjacent to Building #24).

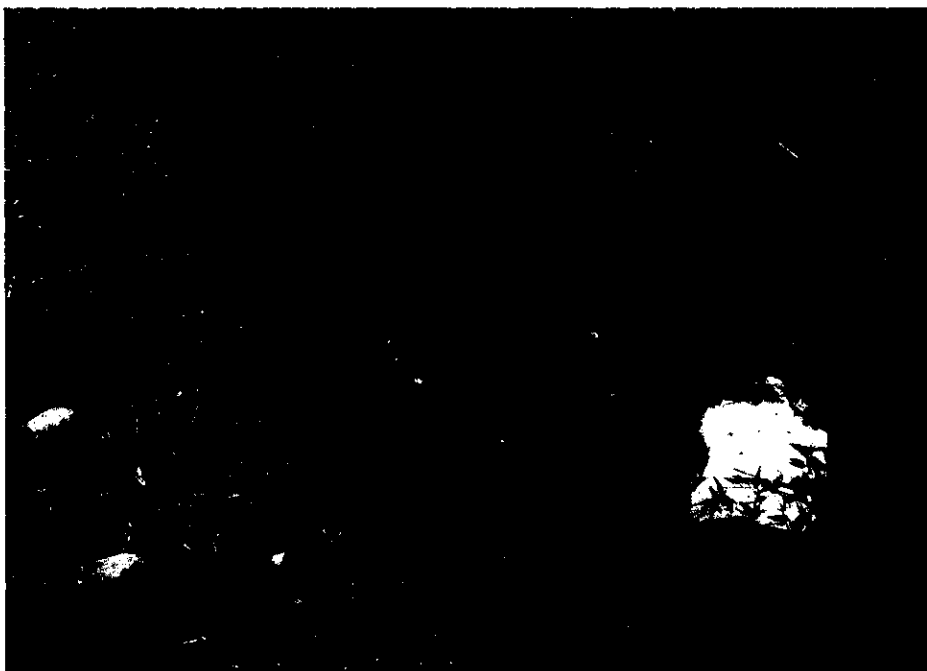
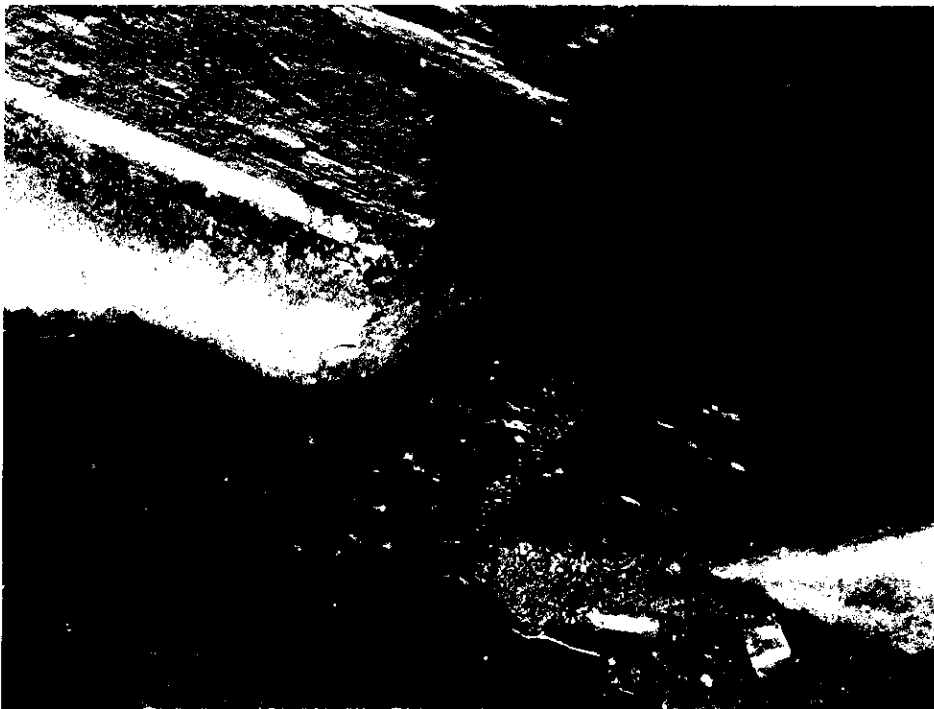


Photo #11 – Wastewater overflowing in the back of Building #24 (adjacent to street and school).



Photo #12 and #13 - Wastewater flowing thru the stormwater collection system on the back of Building #30.



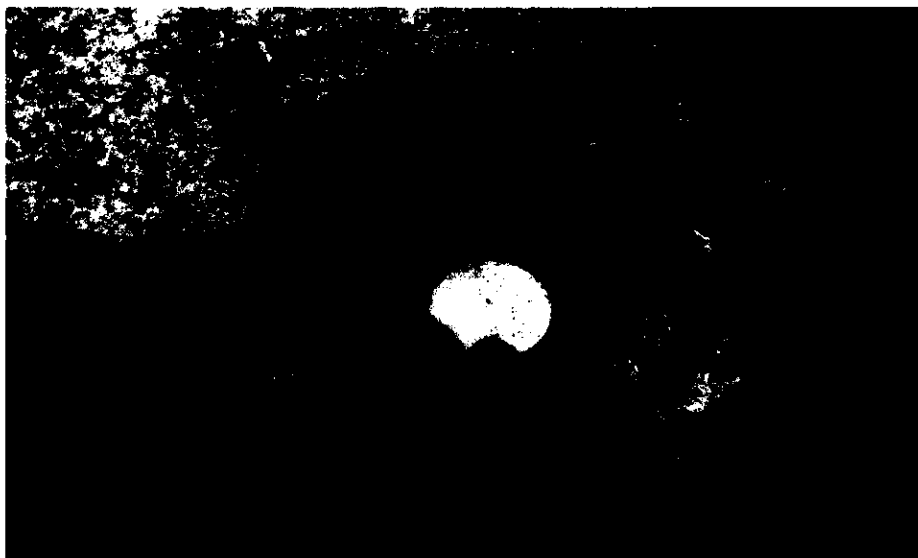


Photo #14 - Stormwater manhole located in the back of building #30 with significant flow of wastewater and foam related to grey waters.



Photo #15 - Wastewater manhole between Buildings #5 and #30. The manhole was found with solids accumulation clogging its half-pipe.



Photo #16 - Wastewater service connection overflowing and located in the back of Building #5 (near baseball park).



Photo #17 - Wastewater service connection overflowing and located in the back of Building #5 (near baseball park). Residents claimed that the situation has been affecting them since more than a year. The situation was also documented on July 24, 2014.



Photo #18 - Wastewater manhole adjacent to the baseball park, filled with solids and sand.



Photo #19 - Stormwater manhole adjacent to the basketball court with significant amount of flow with wastewater characteristics.



Photo #20 and #21 - Open channel headed to Corozos Lagoon, located northern part of the housing complex in front of the basketball court with a wastewater discharge flow coming from the previous stormwater manhole.





Photo #22 and #23 - Wastewater flowing from a pipe located in front of Building #4 and apartment #55 into the stormwater collection channel.



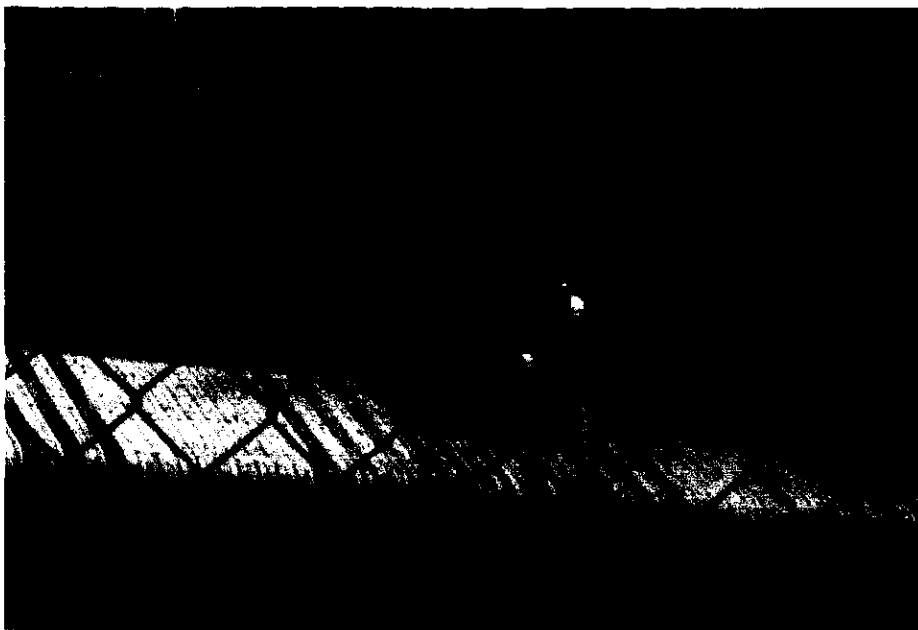


Photo #24 and #25 – View of some of the buildings with pipes conveying grey waters into the stormwater collection channels.





Photo #26 and #27 – Wastewater manhole located in the sidewalk and corner of Building #15. The manhole was found with high levels of wastewater and with green markings that allegedly were marked by PRASA. The residents claimed that the area has been subject to wastewater overflows during the past years.





Photo #28 and 29 – View of the northwest part of the Villa Kennedy Housing Complex bordering the Los Corozos Lagoon. The lagoon was found with significant amounts of trash accumulated on its shore. Additionally the area estuarine wetlands were found filled by construction debris and other rubbish.





Photo #30 and 31 - View of the northwest part of the Villa Kennedy Housing Complex bordering the Los Corozos Lagoon. The area estuarine wetlands were found filled by construction debris and other rubbish. The estuarine wetland vegetation was also impacted and removed in some areas.

